

Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

United States District Court
Southern District of Texas

APR 02 2018

David J. Bradley, Clerk of Court

UNITED STATES DISTRICT COURT

for the

Southern District of TEXAS_____
DivisionTrese ZINA Rogers

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

City of Houston Admini...

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Case No. _____

(to be filled in by the Clerk's Office)

Jury Trial: (check one)



Yes



No

Employment discrimination

Title

Complaint: Answer

to motion to

COMPLAINT FOR A CIVIL CASE

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name

ZINA Rogers

Street Address

2901 FULTON ST.

City and County

HOUSTON, HARRIS

State and Zip Code

TEXAS 77009

Telephone Number

832-870-8047

E-mail Address

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

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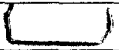
Defendant No. 1

Name
Job or Title (if known)
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address (if known)

City of Houston
LEGAL DEPARTMENT
900 BAUGH 4th floor
HOUSTON, Harris
TX 77002
832-393-6491

Defendant No. 2

Name
Job or Title (if known)
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address (if known)



Defendant No. 3

Name
Job or Title (if known)
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address (if known)

Defendant No. 4

Name
Job or Title (if known)
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address (if known)

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? (check all that apply)

☐ Federal question

☒ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

Title VII Civil Rights Act 1964, 1984, FEDERAL STATUTE
(42 U.S.C. SECTION 1981A) DISCRIMINATION IN
EMPLOYMENT ACT

B. If the Basis for Jurisdiction Is Diversity of Citizenship**1. The Plaintiff(s)****a. If the plaintiff is an individual**

The plaintiff, (name) Mrs. ZINA ROGERS, is a citizen of the
State of (name) TEXAS.

b. If the plaintiff is a corporation

The plaintiff, (name) _____, is incorporated
under the laws of the State of (name) _____,
and has its principal place of business in the State of (name) _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)**a. If the defendant is an individual**

The defendant, (name) City of Houston Adams, is a citizen of
the State of (name) TEXAS. Or is a citizen of
(foreign nation) _____.

b. If the defendant is a corporation

The defendant, (name) City of Houston Adm. is incorporated under the laws of the State of (name) VII (1964) DISCRIMINATION and has its principal place of business in the State of (name) UNEMPLOYMENT ACT TEXAS.
Or is incorporated under the laws of (foreign nation) _____,
and has its principal place of business in (name) _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (explain):

WRONGFUL TERMINATION DAMAGES TO 65 MILLION TO 100
MY FIRST JOB, AT 21 - AM I CAME TO MY SUPERVISOR
DECIDES TO VIOLATE MY CIVIL RIGHTS - AM CONSTITUTION
AL RIGHTS - FIRED WITHOUT A REASON, I WENT TO
EEOC - I TRIED TO GO DOWN THE LINE, TO COMPLAINT TO

III. Statement of Claim

WAS NEVER ANSWERED, I GOT HURT ON THE JOB, NO PAYMENT
FOR THAT - RETALIATION UNEMPLOYMENT BENEFITS DENIED
Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

Charge SEXUAL HARASSMENT, I WROTE TO HUMAN RESOURCES,
I WENT TO EEOC - THEY DIDN'T TRY, TO HELP ME.

MR. WALTER ROSE SUPERVISOR - HE LEFT THE 3RD SHIFT
AM I CAME TO 2ND SHIFT. AM I DID THE SAME THING SEXUAL

HARASSMENT - I APPLIED FOR A JOB WITH THE CITY OF HOUSTON
RETALIATION OCCUR IN THE CITY OF HOUSTON ADMINISTRATION STAFF
BUT DENIED - I AM THE VICTIM IN THIS MATTER. OF THE

SUPERVISOR
IV. Relief EEOC DECIDES TO HELP ME, WRONGFUL DISCHARGE - A CHARGE IS
COMPLETE WITH EEOC - 6/14/2017 DISCRIMINATED AGAINST TO ASK ME
SIT ON HIS LAP.

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

UNEMPLOYMENT WAS APPEAL AND WORKMAN'S COMP.
BACK - PAY, SEVERANCE - PAY, RETIREMENT FOR 3 YRS - THAT WAS

RETIREMENT
PLAN - FOR MONEY DAMAGES TO ANY EMPLOYEE WHO HAD AN INJURY
ON THE JOB -
BEEN THE VICTIM OF INTENTIONAL DISCRIMINATION
IN EMPLOYMENT & LOST INCOME AND BENEFITS TO
REIMBURSEMENT FOR OUT OF POCKET EXPENSES, FOR
COMPENSATORY DAMAGES MENTAL AND EMOTIONAL PAIN
ENTITLED TO EQUITABLE REMEDIES OF PAIN / SUFFERING
AND TAKEN TEMP LABOR JOBS - \$7.25 WHEN I WAS MAKING \$8.44
- AS A LABORER -

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Under federal law, with 15 or more employees are covered by Title VII, the primary law prohibiting employment discrimination the Americans with Disabilities Act. . .
Firing employees, wage and hour rules

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 6/27/2017

Signature of Plaintiff

Printed Name of Plaintiff

Amina F. Rogers
Amina Romane Rogers

B. For Attorneys

Date of signing: _____

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address